UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE:	§	
	§	
Galleria 2425 Owner, LLC	§	Case No. 23-34815
	§	
Debtor	§	
	§	

DEBTOR'S MOTION FOR EXTENSION TO FILE SCHEDULES, STATEMENT OF FINANCIAL AFFAIRS AND OTHER SECTION 521 DOCUMENTS

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

ADUIO COMMUNICATION WILL BE BY USE OF THE COURT'S DIAL IN FACILITY. YOU MAY ACCESS THE FACILITY AT 832-917-1510. YOU WILL BE RESPONSIBLE FOR YOUR OWN LONG DISTANCE CHARGES. ONCE CONNECTED, YOU WILL BE ASKED TO ENTER THE CONFERENCE ROOM NUMBER. JUDGE NORMAN'S CONFERENCE ROOM NUMBER IS 174086.

YOU MAY VIEW VIDEO VIA GOTOMEETING. TO USE GOTOMEETING, THE **COURT RECOMMENDS THAT** YOU DOWNLOAD THE FREE GOTOMEETING APPLICATION. TO CONNECT, YOU **SHOULD ENTER** THE **MEETING** "JUDGENORMAN" IN THE GOTOMEETTING APP OR CLICK THE LINK ON JUDGE NORMAN'S HOME PAGE IN THE SOUTHERN DISTRICT OF TEXAS WEBSITE. ONCE CONNECTED, CLICK THE SETTINGS ICON IN THE UPPER RIGHT HAND CORNER AND ENTER YOUR NAME UNDER PERSONAL INFORMATION SETTING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Galleria 2425 Owner, LLC ("Debtor"), Debtor-in-possession, in the above bankruptcy case, hereby files this Debtor's Motion for Extension of Time to File Schedules, Statement of Financial Affairs and Other 521 Documents, and in support thereof would show this Court as follows:

- 1. Debtor filed a voluntary petition for relief on December 5, 2023, under Chapter 11 of Title 11, United States Code 11 U.S.C. § 101 *et seq.* (the "Bankruptcy Code").
- 2. The Debtor's schedules, statement of financial affairs and other 521 documents are due.

Jurisdiction and Venue

3. This Court has jurisdiction over this case and this matter pursuant to 28 U.S.C. §§ 157 and 1334.

Relief Requested

4. The Debtor has been actively working on information. The Debtor has also been working on various other matters. In order to finalize its schedules, the Debtor seeks an additional extension to December 27, 2023 to file its schedules, statement of financial affairs and other 521 documents.

Reasons Why the Relief Should be Granted

- 5. The Debtor is an owner of an office building in the Galleria area of Houston at 2425 West Loop South, Houston, Texas 77027. The Debtor has been required to spend time since the bankruptcy filing in addressing litigation issue.
- 6. The section 341creditors meeting has been set for January 10, 2024.

WHEREFORE, PREMISES CONSIDERED, the Debtor requests that this Court grant the Debtor an extension of time to file the schedules, statement of financial affairs *Motion to Extend Time*

and other 521 documents to December 27, 2023, and for such other and further relief to which the Debtor may be entitled.

Dated: December 19, 2023

Respectfully submitted,

/s/Reese W. Baker
Reese W. Baker
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Baker & Associates
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Houston, Texas 77024
(713) 869-9200
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ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on December 19, 2023, I caused a copy of the foregoing document to be delivered to the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Reese W. Baker Reese W. Baker